



Rachel Carson State Office Building
P.O. Box 8467
Harrisburg, PA 17105-8467
December 17, 2008

Small Systems Technical Assistance Center Advisory Board

717-787-5017

Mr. Dana Aunkst
Director
Bureau of Water Standards and Facility Regulation
P.O. Box 8467
Harrisburg, PA 17105-8467

Dear Director Aunkst:

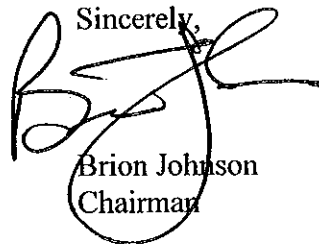
The Small Systems Technical Assistance Center Advisory Board met on December 1, 2008 to discuss the Department's concept paper on revisions to the proposed fee structure for the Drinking Water and Wastewater Systems Operator's Certification Program. We understand the Department will use this input to develop a final fee structure to cover all the costs of this program in the next draft of the draft regulations, Chapter 302, Administration of the Water and Wastewater Systems Operators' Certification Program.

1. The Department needs to revisit the wastewater system numbers used in the proposal. In addition, a more equitable way of allocating the fees to system owners needs to be found. The costs to systems should be shared equally across the customer base. After some discussion, we suggest using either a breakdown by population served or flow. By basing the fees on flow, there is more of a link between operator requirements and the associated workload for state program staff. It can be assumed that there is a direct correlation between the size of the system, the amount of water treated and the number of certified operators needed to adequately operate the system. Information on the number of systems in each category and the associated customer base should be included in the final submittal.
2. Some of our members recommend eliminating the post-presentation application process. Operators need to take on the responsibility to insure the training they take is approved by the Department before taking the course. Other members recognized this as a viable option in some cases and felt the post-presentation approval process should be kept.
3. We would like to propose a variation to Option 3B as a suggested framework for the charging of fees. The goal behind this option is to balance the costs equally among those who will be assessed the fees:
 - a. Decrease the initial certification and renewal fee to \$50.
 - b. Decrease the examination provider fee to \$50.
 - c. Decrease the course roster fees to \$40.

- d. Increase the fees to drinking water and wastewater systems from \$575 to \$650 for the larger systems and \$65 for the small systems. We recognize that these proposed fees for the larger systems could change based on the final breakout based on system size.
4. The Department should solicit information from neighboring states with similar programs on their program budget and fee structure to see if the final proposed fee structure and budget is realistic.
5. The system service fee should be assessed based on either the PWSID or NPDES permit. We realize this means some companies with multiple systems will be paying more, based on the number of different systems they have permitted. However, by doing it this way, the fees could be more evenly distributed among a larger number of systems than the numbers the Department is now using and the actual fee per system will be lower.

Thank you for the opportunity to comment. We look forward to continue to working with you both as these regulations move forward. If you have any questions concerning these comments, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brion Johnson', is written over the typed name and title. The signature is stylized and somewhat cursive.

Brion Johnson
Chairman